

***IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND (NORTHERN DIVISION)***

PATRICE WOLFE

*

Plaintiff

*

v.

Civil Action No. L02 CV-3965

*

MED-TEL INTERNATIONAL CORPORATION

*

Defendant

*

* * * * *

**PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

Plaintiff through counsel responds in opposition to Defendant's Motion to for Summary Judgment as follows:

1. Plaintiff's hostile environment/sexual harassment claim is not time barred because the Record supports characterization of it as a continuing violation.
2. Plaintiff's retaliation claim based upon her termination should not be dismissed because the Record, viewed in the light most favorable to Plaintiff, allows the trier of fact to infer her termination was substantially motivated by a retaliatory animus.

Wherefore, it is respectfully requested this Honorable Court deny Defendant's Motion for Summary Judgment and grant Plaintiff such other and further relief as the nature of her cause may warrant.

/s/

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Telephone: 410-546-1750
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of May, 2004, an exact copy of the Plaintiff's Opposition to Defendant's Motion for Summary Judgment, accompanying Memorandum and exhibits were sent by regular U.S. mail, first class postage prepaid, to:

Jeanne M. Phelan, Esq.
Whiteford, Taylor & Preston, L.L.P.
Seven Saint Paul Street, Suite 1300
Baltimore, Maryland 21202-1626

_____/s/_____
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